

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,
OPENAI LP, OPENAI GP, LLC, OPENAI,
LLC, OPENAI OPCO LLC, OPENAI GLOBAL
LLC, OAI CORPORATION, LLC, OPENAI
HOLDINGS, LLC,

Defendants.

Case No. 1:23-cv-11195-SHS

**NOTICE OF MOTION
TO ADMIT COUNSEL
PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Andrew M. Gass, hereby move this Court for an Order for admission to practice pro hac vice to appear as counsel for Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC, OpenAI Holdings, LLC, (together, “OpenAI”), in the above-captioned action.

I am a member in good standing of the bar of the State of California and a certificate of good standing is attached hereto as **Exhibit A**. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

Dated: January 29, 2024
San Francisco, CA

Respectfully Submitted,

LATHAM & WATKINS LLP

/s/ Andrew M. Gass

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